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Attorneys for Defendants Walter Meier Holding Corporation

The Honorable Garr M. King

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

TODD YANDELL,

Plaintiff,

v.

WALTER MEIER HOLDING AG, a Swiss Corporation; **WMH TOOL GROUP, INC.**, a Tennessee Corporation; **WALTER MEIER (MANUFACTURING) INC.**, a Tennessee Corporation; **WALTER MEIER HOLDING CORPORATION**, a Delaware Corporation,

Defendants.

Case No. 3:11-CV-266-KI

DECLARATION OF RACHEL A. ROBINSON IN SUPPORT OF DEFENDANT WALTER MEIER HOLDING CORPORATION'S UNOPPOSED MOTION FOR EXTENSION OF TIME FOR REPLY IN SUPPORT OF AND HEARING ON RULE 12(b)(2) MOTION TO DISMISS

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I, Rachel A. Robinson, state as follows:

1. I am one of the attorneys for defendant Walter Meier Holding Corporation (“Walter Meier Holding”) in the above captioned lawsuit. I have personal knowledge of the following information and am competent to testify to the same.

2. On April 12, 2011, plaintiff’s counsel agreed to extend the deadline for Walter Meier Holding to file and serve its reply in support of the Rule 12(b)(2) motion to dismiss to April 20, 2011. Plaintiff’s counsel also agreed to reschedule the hearing on the motion for a mutually convenient date and time during the week of May 2, 2011.

3. The extension is sought to allow the parties additional time to confer regarding the issues raised in the motion and attempt to resolve the dispute without involvement by the Court.

4. This motion is made in good faith and not for purposes of delay.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 12th day of April, 2011.

s/ Rachel A. Robinson, OSB #084550
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Attorneys for Defendants Walter Meier Holding Corporation

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